Exhibit A

JOINT CLAIM CHART AND PREHEARING STATEMENT
Exhibit A
Case No. 2:18-cv-00847-JLR

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206-467-9600

Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
1	"cellular-based location data" Found in claim numbers: '803 Patent: 1, 14, 30	Proposed Construction: **"cellular-based location data"** - location data based on a cellular positioning system capable of tracking the position of a device in an area of interest Intrinsic Evidence: '803 Patent, 3:8–17 ("… In addition to these features, the terminal is equipped with a receiver for acquiring location data from an external positioning system, which may be satellite-based, cellular-based, or any other type capable of tracking the position of an object in an area of interest."). '803 Patent, 3:18–24 ("In operation, the location data receiver inputs position information into the processor, which then generates an icon corresponding to the position of the data terminal on the digital map. Advantageously, the processor updates the position of this icon as the terminal moves through the mapped region."). '803 Patent, 3:19–31 ("In operation, the location data receiver inputs position information into the processor, which then generates an icon corresponding to the position of the data terminal on the digital map. Advantageously, the processor updates the position of this icon as the terminal moves through the mapped region. If desired, the	Proposed Construction: "data relating to a cellular-based positioning system used to determine the location of a device" Intrinsic Evidence: '803 Patent at 3:8–17 ("… In addition to these features, the terminal is equipped with a receiver for acquiring location data from an external positioning system, which may be satellite-based, cellular-based, or any other type capable of tracking the position of an object in an area of interest."). *Id.* at 3:18–24 ("In operation, the location data receiver inputs position information into the processor, which then generates an icon corresponding to the position of the data terminal on the digital map. Advantageously, the processor updates the position of this icon as the terminal moves through the mapped region."). *Id.* at 3:19–31 ("In operation, the location data receiver inputs position information into the processor, which then generates an icon corresponding to the position of the data terminal on the digital map. Advantageously, the processor updates the position of this icon as the terminal moves through the mapped region. If desired, the GPS receiver may be connected to

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		GPS receiver may be connected to the map generation unit, so that upon start-up the processor and map generation unit cooperate to automatically generate a digital map based on the location of the terminal. This is a particularly advantageous feature of the invention because a digital map of a market area with all the aforementioned icons may be generated without any input from the agent or agent buyer."). '803 Patent, 8:45–59 ("Referring to FIG. 4, a second embodiment of the system of the present invention includes a terminal having a map generation unit 201, a storage unit 202, a processor 203, and a display 204. Unlike the first embodiment, this terminal is not a stand-alone system but rather is a mobile terminal connected to a location-positioning system via a communications link. The positioning system may be the Global Positioning System (GPS) or any of a variety of other positioning systems which use, for example, satellite data to determine location on a digital map. Accordingly, the terminal of the second embodiment includes a location data receiver 205 which may be a GPS receiver adapted to operate with a digital map. GPS receivers of this type are known to those skilled in the art. See, for example, U.S. Pat. Nos. 6,321,158 and 6,256,582.").	the map generation unit, so that upon start-up the processor and map generation unit cooperate to automatically generate a digital map based on the location of the terminal. This is a particularly advantageous feature of the invention because a digital map of a market area with all the aforementioned icons may be generated without any input from the agent or agent buyer."). *Id.* at 8:45–59 ("Referring to FIG. 4, a second embodiment of the system of the present invention includes a terminal having a map generation unit 201, a storage unit 202, a processor 203, and a display 204. Unlike the first embodiment, this terminal is not a stand-alone system but rather is a mobile terminal connected to a location-positioning system via a communications link. The positioning system may be the Global Positioning System (GPS) or any of a variety of other positioning systems which use, for example, satellite data to determine location on a digital map. Accordingly, the terminal of the second embodiment includes a location data receiver 205 which may be a GPS receiver adapted to operate with a digital map. GPS receivers of this type are known to those skilled in the art. See, for example, U.S. Pat. Nos. 6,321,158 and 6,256,582.").

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		'803 Patent, 9:26–42 ("In a fifth step, the GPS receiver in the terminal receives location data from the GPS system. As shown in FIG. 6, receipt of this data may be initiated by the "Turn GPS On" selection window 177 in FIG. 3. This location data specifies a current position of the terminal, to within a small error. The GPS receiver inputs the location data into the processor, which then generates an icon 280 on the digital map indicating the current position of the terminal. (Block 250). Because the GPS receiver is a dynamic device, it continuously or at least periodically receives location data which updates the current location of the terminal as the terminal moves. The processor receives this data and causes the current-position icon 280 to move in a corresponding manner. As a result, a user can observe his location on the digital map relative to the locations of the properties identified by the selectable icons."). '803 Patent, 9:51–62 ("As an alternative to the first and second steps, the second embodiment of the method of the present invention may begin with activation of the GPS receiver via selection area 208. (Block 260). This will cause the GPS receiver of the terminal to receive GPS data indicative of a current location of the terminal. This data is then forwarded to the processor, which then automatically activates the map	*Id.* at 9:26–31 ("In a fifth step, the GPS receiver in the terminal receives location data from the GPS system. As shown in FIG. 6, receipt of this data may be initiated by the "Turn GPS On" selection window 177 in FIG. 3. This location data specifies a current position of the terminal, to within a small error."). *Id.* at 9:51–60 ("As an alternative to the first and second steps, the second embodiment of the method of the present invention may begin with activation of the GPS receiver via selection area 208. (Block 260). This will cause the GPS receiver of the terminal to receive GPS data indicative of a current location of the terminal. This data is then forwarded to the processor, which then automatically activates the map generation unit to generate a map of an area surrounding the current location of the terminal, as determined by the received GPS data. (Block 270)."). See also *Id.* at Figs. 4, 5. Dictionary/Treatise Definitions: (none) Extrinsic Evidence: (none)

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		generation unit to generate a map of an area surrounding the current location of the terminal, as determined by the received GPS data. (Block 270). Subsequent steps of the method may then proceed as described above."). *See also* '803 Patent, Figs. 4, 5, Claim 4. Dictionary/Treatise Definitions: (none) Extrinsic Evidence: (none)	

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
2	"a map generation unit for generating a digital map covering an area of interest, wherein said area of interest is obtained from the cellular-based location data" Found in claim numbers: '803 Patent: 14	Proposed Construction: Plain and ordinary meaning (Not a means-plus-function term) Intrinsic Evidence: '803 Patent, 2:40–52 ("In accordance with one embodiment of the invention, the data terminal is a stand-alone system which includes a map generation unit, a storage unit, a processor, and a display. The map generation unit generates a digital map of an area of interest designated by a user. Preferably, the map includes street address labels and/or other symbols of topological and man-made features in the coverage area. The storage unit stores property information derived from an MLS database, media information, and/or other customized information which may be considered important to a customer in purchasing, leasing, or renting property. The processor implements management software which integrates the property information with the digital map."). '803 Patent, 4:15–30 ("Referring to FIG. 1, a first embodiment of the system of the present invention includes a stand-alone data terminal for helping buyers and/or real-estate agents locate property information in a specific geographic area. The terminal is equipped with a map	Proposed Construction: This is a 112(6) claim element. **Function**: Generating a digital map covering an area of interest, where said area of interest is obtained from the cellular-based location data. **Structure**: none disclosed. Indefinite Intrinsic Evidence: '803 Patent at 4:30–56 ("The map generation unit 1 generates a digital map for presentation on the display of the terminal. The digital map covers areas in a real-estate market which, for example, have been designated by a user using a keyboard or other input device. The areas cover one or more counties, cities, or towns in a state. If memory requirements permit, a map of an entire state or region of the country (e.g., the mid-Atlantic region) may be generated. Preferably, the maps generated by unit 1 are detailed enough to show streets in at least a portion of the selected geographic area. Other features typically found on paper maps may also be shown, including but not limited to: topological features (e.g., bodies of water, mountains, etc.), parks, military installations,

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		generation unit 1, a storage unit 2, a processor 3, and a display 4. Preferably, the terminal is mobile in nature, taking the form of a notebook or laptop computer, personal digital assistant, pocket-PC, web-enabled phone, or other portable device having at the very least a processor and memory. Alternatively, the terminal may be a desktop computer located, for example, in a real-estate broker's office, an agent's home, or in any of a variety of other fixed locations. In the case where the terminal is mobile, a real estate office may loan the terminal to buyers for use on their own time."). '803 Patent, 4:31–38 ("The map generation unit 1 generates a digital map for presentation on the display of the terminal. The digital map covers areas in a real-estate market which, for example, have been designated by a user using a keyboard or other input device. The areas cover one or more counties, cities, or towns in a state. If memory requirements permit, a map of an entire state or region of the country (e.g., the mid-Atlantic region) may be generated."). '803 Patent, 4:39–56 ("Preferably, the maps generated by unit 1 are detailed enough to show streets in at least a portion of the selected geographic area. Other features typically found on paper maps may also be shown, including but	schools, amenities (e.g., shopping areas, food, lodging, etc.), recreational facilities (e.g., golf courses, swimming pools, community centers, etc.), subway and/or train routes, airports, government buildings, and zoning information. For convenience purposes, the streets and other features on the map may be labeled by one or more symbols or icons. Map generation units of this type are known by those skilled in the art and may include, for example, MapPoint offered by Microsoft or those disclosed in U.S. Pat. Nos. 5,844,570 and 5,884,216. A web-accessible map generation program which also may be used in accordance with the present invention goes under the name of MapQuest.®"). *Id.* at 6:9-17 ("FIG. 2 is a flow diagram showing steps included in a first embodiment of the method of the present invention, which may be implemented by the stand-alone system previously described. The method begins by having a real-estate agent or other user enter property information into the terminal which identifies a geographical area having one or more properties available on the market. (Block 10). The property information may be entered into one of the data fields previously mentioned, and may correspond to a city, town, or county or even a specific address.").

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		not limited to: topological features (e.g., bodies of water, mountains, etc.), parks, military installations, schools, amenities (e.g., shopping areas, food, lodging, etc.), recreational facilities (e.g., golf courses, swimming pools, community centers, etc.), subway and/or train routes, airports, government buildings, and zoning information. For convenience purposes, the streets and other features on the map may be labeled by one or more symbols or icons. Map generation units of this type are known by those skilled in the art and may include, for example, MapPoint offered by Microsoft or those disclosed in U.S. Pat. Nos. 5,844,570 and 5,884,216. A web-accessible map generation program which also may be used in accordance with the present invention goes under the name of MapQuest.®"). '803 Patent, 8:45–48 ("Referring to FIG. 4, a second embodiment of the system of the present invention includes a terminal having a map generation unit 201, a storage unit 202, a processor 203, and a display 204."). '803 Patent, 9:4–12 ("In a second step, the property information is used as a basis for generating a digital map by the map generation unit. (Block 220). The digital map may cover all or a portion of the area specified according to one or more user-specified settings or a default	*Id.* at 6:18-32 ("In a second step, the property information is used as a basis for generating a digital map by the map generation unit. (Block 20). If the property information is a geographical area, the processor inputs this information directly into the map generation unit, which outputs an appropriate map in response. The digital map may cover all or part of the area specified according to one or more user-specified settings or a default setting. If a specific address is entered, the digital map may cover a predetermined radius centered on that address. Of course, as with many standard map generation programs the coverage area may be changed by the user. These keys may allow a user to zoom the map coverage area in or out, or may allow the map to skew in any desired direction (north, south, east, west).") *Id.* at 8:45-59 ("Referring to FIG. 4, a second embodiment of the system of the present invention includes a terminal having a map generation unit 201, a storage unit 202, a processor 203, and a display 204. Unlike the first embodiment, this terminal is not a stand-alone system but rather is a mobile terminal connected to a location-positioning system via a communications link. The positioning system may be the Global Positioning System (GPS) or any of a variety of other positioning systems

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		setting. If a specific address is entered, the digital map may cover a predetermined radius centered on that address. Of course, as with many standard map generation programs the coverage area may be changed by the user."). '803 Patent, 9:52–62 ("As an alternative to the first and second steps, the second embodiment of the method of the present invention may begin with activation of the GPS receiver via selection area 208. (Block 260). This will cause the GPS receiver of the terminal to receive GPS data indicative of a current location of the terminal. This data is then forwarded to the processor, which then automatically activates the map generation unit to generate a map of an area surrounding the current location of the terminal, as determined by the received GPS data. (Block 270). Subsequent steps of the method may then proceed as described above."). '803 Patent, 9:63–67 ("In another variation of the second embodiment, the GPS receiver may be directly connected to the map generation unit. When location data is received from the receiver, the map generation unit may automatically respond by generating a map of a surrounding area on the display.").	which use, for example, satellite data to determine location on a digital map. Accordingly, the terminal of the second embodiment includes a location data receiver 205 which may be a GPS receiver adapted to operate with a digital map. GPS receivers of this type are known to those skilled in the art. See, for example, U.S. Pat. Nos. 6,321,158 and 6,256,582."). *Id.* at 9:4-17 ("In a second step, the property information is used as a basis for generating a digital map by the map generation unit. (Block 220). The digital map may cover all or a portion of the area specified according to one or more user-specified settings or a default setting. If a specific address is entered, the digital map may cover a predetermined radius centered on that address. Of course, as with many standard map generation programs the coverage area may be changed by the user."). *Id.* at 9:57-60 ("This data is then forwarded to the processor, which then automatically activates the map generation unit to generate a map of an area surrounding the current location of the terminal, as determined by the received GPS data.").

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		'803 Patent, 3:19–32 ("In operation, the location data receiver inputs position information into the processor, which then generates an icon corresponding to the position of the data terminal on the digital map. Advantageously, the processor updates the position of this icon as the terminal moves through the mapped region. If desired, the GPS receiver may be connected to the map generation unit, so that upon start-up the processor and map generation unit cooperate to automatically generate a digital map based on the location of the terminal. This is a particularly advantageous feature of the invention because a digital map of a market area with all the aforementioned icons may be generated without any input from the agent or agent buyer."). '803 Patent, 5:67–6:2 ("The graphical user interface also organizes the presentation of information output from the map generation and storage units.") '803 Patent, 6:21–6:32 ("In a second step, the property information is used as a basis for generating a digital map by the map generation unit. (Block 20). If the property information is a geographical area, the processor inputs this information directly into the map generation unit, which outputs an appropriate map in response. The digital map may cover all or part of the area	*Id.* at 9:63-67 ("In another variation of the second embodiment, the GPS receiver may be directly connected to the map generation unit. When location data is received from the receiver, the map generation unit may automatically respond by generating a map of a surrounding area on the display."). *See also Id.* at Figs. 1, 2, 4. Extrinsic Evidence: Expert Declaration of B. Bederson, ¶¶ 48-57. Dictionary/Treatise Definitions: (none)

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		specified according to one or more user-specified settings or a default setting. If a specific address is entered, the digital map may cover a predetermined radius centered on that address. Of course, as with many standard map generation programs the coverage area may be changed by the user. These keys may allow a user to zoom the map coverage area in or out, or may allow the map to skew in any desired direction (north, south, east, west)."). '803 Patent, 6:49–67 ("… This computer screen was generated as a result of a user entering location data designating the geographical area of Arlington, Va. Using this data, the map generation unit generated a map 100 covering this area. …"). '803 Patent, 8:22–29 ("Additionally, the processor may control the map generation unit to display a map covering a predetermined area surrounding the location of the listing. Like in the previous case, the map may include icons representing available property in the area displayed in the map."). '803 Patent, Figs. 1, 2, 3, 4, 5, 6.	

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		U.S. Patent No. 5,844,570 U.S. Patent No. 5,884,216 Dictionary/Treatise Definitions: (none) Extrinsic Evidence: Rebuttal Declaration of Mark A. Sturza, ¶¶ 34–44 U.S. Patent No. 6,459,782 B1 U.S. Patent No. 6,594,581 B2 *To the extent the Court determines this claim term is a means-plus-function term, Plaintiff contends that corresponding structure for the recited function is described in the specification, as cited above.	

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
3	"a storage unit for storing property information which includes multiple listing service (MLS) data comprising a location, a market price and a market status of an item of property in said area of interest" Found in claim numbers: '803 Patent: 14	Proposed Construction: "**storage unit**" – device capable of information storage functions in a computer system, including memory (Not a means-plus-function term) Intrinsic Evidence: '803 Patent, 2:40–52 ("In accordance with one embodiment of the invention, the data terminal is a stand-alone system which includes a map generation unit, a storage unit, a processor, and a display. The map generation unit generates a digital map of an area of interest designated by a user. Preferably, the map includes street address labels and/or other symbols of topological and man-made features in the coverage area. The storage unit stores property information derived from an MLS database, media information, and/or other customized information which may be considered important to a customer in purchasing, leasing, or renting property. The processor implements management software which integrates the property information with the digital map."). '803 Patent, 4:15–30 ("Referring to FIG. 1, a first embodiment of the system of the present invention includes a stand-alone data terminal for helping buyers and/or real-estate agents locate	Proposed Construction: This is a 112(6) claim element. **Function**: Storing property information which includes multiple listing service (MLS) data comprising a location, a market price and a market status of an item of property in said area of interest in a database on a mobile computing device, and obtaining the property information from said database. **Structure**: hard drive, non- volatile memory, floppy disk, CD-ROM, flash memory, or a combination thereof, or equivalent non-volatile storage. **Alternatively, if not determined to be means+function term**, "**storage unit**" includes "storing the property information in a database on the mobile computing device, and obtaining the property information from that database." Intrinsic Evidence: '803 Patent at 5:19-31 ("In terms of hardware, the storage unit of the present invention may be any type found in a data terminal or computing device. For example, if the terminal is a notebook computer, the storage unit may be a

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		property information in a specific geographic area. The terminal is equipped with a map generation unit 1, a storage unit 2, a processor 3, and a display 4. Preferably, the terminal is mobile in nature, taking the form of a notebook or laptop computer, personal digital assistant, pocket-PC, web-enabled phone, or other portable device having at the very least a processor and memory. Alternatively, the terminal may be a desktop computer located, for example, in a real-estate broker's office, an agent's home, or in any of a variety of other fixed locations. In the case where the terminal is mobile, a real estate office may loan the terminal to buyers for use on their own time."). '803 Patent, 4:57–5:18 ("The storage unit 2 stores information considered to be important by a real-estate agent and/or a buyer in searching for property to buy, lease, or rent. …."). '803 Patent, 5:19–32 ("In terms of hardware, the storage unit of the present invention may be any type found in a data terminal or computing device. For example, if the terminal is a notebook computer, the storage unit may be a hard-drive, non-volatile memory, or even a removable storage medium such as a floppy disk or CD-ROM. If the terminal is a PDA, the storage unit may take the form of a flash memory. If desired,	hard-drive, non-volatile memory, or even a removable storage medium such as a floppy disk or CD-ROM. If the terminal is a PDA, the storage unit may take the form of a flash memory. If desired, the storage unit of the present invention may include a combination of the aforementioned storage devices. Those skilled in the art can appreciate that the aforementioned types of devices are mentioned merely by way of example, and that if desired other conventional types of storage devices may be used."). Original Prosecution File History, 2/19/03 Amendment at 13 ("The claims, as amended, require generating and displaying information about a real-estate market for a geographical area of interest on a mobile computing device. A digital map is generated and displayed on the mobile computing device for an area of interest. Property information for an item of property in the area of interest is obtained from a database stored on the mobile device. This property information includes at least a location, a market price and a market status of the item of property. A property icon associated with the item of property is displayed on the digital map at the location of the item of property. In response to the property icon being selected, property information about the item of property associated

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		the storage unit of the present invention may include a combination of the aforementioned storage devices. Those skilled in the art can appreciate that the aforementioned types of devices are mentioned merely by way of example, and that if desired other conventional types of storage devices may be used."). '803 Patent, 5:67–6:2 ("The graphical user interface also organizes the presentation of information output from the map generation and storage units."). '803 Patent, 7:1–14 ("The location of each icon on the map is derived, for example, from the MLS information produced from the storage unit as a result of the search. …"). '803 Patent, 8:45–48 ("Referring to FIG. 4, a second embodiment of the system of the present invention includes a terminal having a map generation unit 201, a storage unit 202, a processor 203, and a display 204."). '803 Patent, Fig. 1, 2, 4, 5. *See also* '803 Patent, 3:8–12, 3:32–44, 4:31–38, 6:33–41, 7:30–40, 7:46–55, 8:14–21, 9:18–25, 10:14–26.	with the selected property icon is also displayed."). *Id.* at 13-14 ("In addition, Wiese teaches accessing a remote system to gather the sales information needed to display symbols at the property locations on the map. (Col. 2, lines 62-67). A shown in Fig. 1, a remote user using CPU 72 would have to go through ISP 44, Internet 32 and Server 30 to access value database 54. In the present invention, the property information is obtained from a data base stored on the mobile computing device."). *See also* Original Prosecution File History, 5/21/03 Notice of Allowability. Extrinsic Evidence: Expert Declaration of B. Bederson, ¶¶ 58-64. Dictionary/Treatise Definitions: (none)

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Joint Claim Chart

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		Dictionary/Treatise Definitions: The American Heritage College Dictionary (4th ed. 2004) (storage: "*Computer Science* The part of a computer that stores information for subsequent use or retrieval."). Microsoft Computer Dictionary (4th ed. 1999) (**storage device** *n.* An apparatus for recording computer data in permanent or semipermanent form. When a distinction is made between primary (main) storage devices and secondary (auxiliary) storage devices, the former refers to random access memory (RAM) and the latter refers to disk drives and other external devices). Extrinsic Evidence: Rebuttal Declaration of Mark A. Sturza, ¶¶ 45–57 *To the extent the Court determines this claim term is a means-plus-function term, Plaintiff contends that corresponding structure for the recited function is described in the specification, as cited above.	

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
4	"a processor for determining information needed to display a property icon for the item of property at the location of the item of property on said digital map, and for determining information needed to display property information about the item of property of the property icon upon selection of the property icon" Found in claim numbers: '803 Patent: 14	Proposed Construction: Plain and ordinary meaning (Not a means-plus-function term) Intrinsic Evidence: '803 Patent, 2:40–52 ("In accordance with one embodiment of the invention, the data terminal is a stand-alone system which includes a map generation unit, a storage unit, a processor, and a display. The map generation unit generates a digital map of an area of interest designated by a user. Preferably, the map includes street address labels and/or other symbols of topological and man-made features in the coverage area. The storage unit stores property information derived from an MLS database, media information, and/or other customized information which may be considered important to a customer in purchasing, leasing, or renting property. The processor implements management software which integrates the property information with the digital map."). '803 Patent, 4:15–30 ("Referring to FIG. 1, a first embodiment of the system of the present invention includes a stand-alone data terminal for helping buyers and/or real-estate agents locate property information in a specific geographic area. The terminal is equipped with a map	Proposed Construction: This is a 112(6) claim element. **Functions**: (1) Determining information needed to display a property icon for the item of property at the location of the item of property on said digital map, and (2) determining information needed to display property information about the item of property of the property icon upon selection of the property icon. **Structure**: none disclosed. Indefinite Intrinsic Evidence: '803 Patent at 2:40-52 ("In accordance with one embodiment of the invention, the data terminal is a stand-alone system which includes a map generation unit, a storage unit, a processor, and a display. The map generation unit generates a digital map of an area of interest designated by a user. Preferably, the map includes street address labels and/or other symbols of topological and man-made features in the coverage area. The storage unit stores property information derived from an MLS database, media information, and/or other customized information which may

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		generation unit 1, a storage unit 2, a processor 3, and a display 4. Preferably, the terminal is mobile in nature, taking the form of a notebook or laptop computer, personal digital assistant, pocket-PC, web-enabled phone, or other portable device having at the very least a processor and memory. Alternatively, the terminal may be a desktop computer located, for example, in a real-estate broker's office, an agent's home, or in any of a variety of other fixed locations. In the case where the terminal is mobile, a real estate office may loan the terminal to buyers for use on their own time."). '803 Patent, 5:32–43 ("The processor 3 may be any type capable of running a program or script for performing the information search, retrieval, and data integration functions of the invention. If the mobile terminal is a notebook computer, the processor may be a microprocessor running an application program which performs various management functions necessary for implementing the method of the present invention. These management functions include retrieving information from the map generation and storage units based on various data inputs and commands, as well as integrating this information for presentation on the display of the terminal.").	be considered important to a customer in purchasing, leasing, or renting property. The processor implements management software which integrates the property information with the digital map."). *Id.* at 5:32-43 ("The processor 3 may be any type capable of running a program or script for performing the information search, retrieval, and data integration functions of the invention. If the mobile terminal is a notebook computer, the processor may be a microprocessor running an application program which performs various management functions necessary for implementing the method of the present invention. These management functions include retrieving information from the map generation and storage units based on various data inputs and commands, as well as integrating this information for presentation on the display of the terminal."). *Id.* at 6:42-48 ("In a fourth step, the processor associates the property information obtained from the third step with the digital map generated in the second step to form an integrated output on the display of the user's terminal. (Block 40). The integrated output is advantageously arranged in selected areas of a

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		'803 Patent, 6:19–48 ("In a second step, the property information is used as a basis for generating a digital map by the map generation unit. (Block 20). If the property information is a geographical area, the processor inputs this information directly into the map generation unit, which outputs an appropriate map in response. The digital map may cover all or part of the area specified according to one or more user-specified settings or a default setting. If a specific address is entered, the digital map may cover a predetermined radius centered on that address. Of course, as with many standard map generation programs the coverage area may be changed by the user. These keys may allow a user to zoom the map coverage area in or out, or may allow the map to skew in any desired direction (north, south, east, west). In a third step, the processor searches the storage unit based on the property information entered by the user, and more specifically to generate a list of properties in the specified area and/or their accompanying attributes. (Block 30). This property information may be any of the types previously described, including MLS data, media information, and other customized information which may be considered important to a buyer in searching for a home, apartment, lot, etc. In a fourth step, the processor associates the property information obtained from the third step with the digital map	dedicated computer screen which forms all or part of the graphical user interface."). *Id.* at 6:57-67 ("FIG. 3 shows an example of a computer screen generated by the processor which integrates the property information and digital map associated during the fourth step. This computer screen was generated as a result of a user entering location data designating the geographical area of Arlington, Va. Using this data, the map generation unit generated a map 100 covering this area. The processor then controlled the location on the computer screen where the map is to be displayed. The results of the storage unit search were then integrated with the map. In the particular example shown, the integration includes the overlaying of icons 110 on the map, where each icon represents the location of a property available in the region covered. The icons may be in the form of any symbol or mark. In accordance with a preferred embodiment of the invention, the icons resemble the type of property at that location, e.g., houses, apartment buildings, lots, etc. The display of icons on the digital map advantageously give a user a clear indication of the number and location of properties in the area."). *Id.* at 7:1-7:8 ("The location of each icon on the map is derived, for example, from the MLS

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No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		generated in the second step to form an integrated output on the display of the user's terminal. (Block 40). The integrated output is advantageously arranged in selected areas of a dedicated computer screen which forms all or part of the graphical user interface."). '803 Patent, 7:1–14 ("The location of each icon on the map is derived, for example, from the MLS information produced from the storage unit as a result of the search. For example, in the area of Arlington shown, the processor search produced ten properties in the area covered by the map. The MLS information corresponding to these properties include addresses which are used by the processor to generate and then overlay the ten house symbols that appear on map 100. A textual listing of these properties with one or more attendant attributes were then displayed in a separate window 150 adjacent the map. This textual listing included information such as MLS number, street address, city, housing development name, market status (e.g., active, contract, sold, etc.), lot price and/or size, numbers of bedrooms, bathrooms, etc."). '803 Patent, 8:45–48 ("Referring to FIG. 4, a second embodiment of the system of the present invention includes a terminal having a map	information produced from the storage unit as a result of the search. For example, in the area of Arlington shown, the processor search produced ten properties in the area covered by the map. The MLS information corresponding to these properties include addresses which are used by the processor to generate and then overlay the ten house symbols that appear on map 100."). *Id.* at 9:18-25 ("In a fourth step, the processor associates the information obtained from the third step with the digital map generated in the second step to form an integrated output on the display of the user's terminal. (Block 240). This results in the display of selectable icons on the digital map and/or textual information in window 170. The first through fourth steps may be performed in a manner analogous to those discussed with respect to the first embodiment."). *See also id.* at Figs. 1, 4. Extrinsic Evidence: Expert Declaration of B. Bederson, ¶¶ 65-72. Dictionary/Treatise Definitions: (none)

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Joint Claim Chart

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		generation unit 201, a storage unit 202, a processor 203, and a display 204."). '803 Patent, 9:12–42 ("In a third step, the processor searches the storage unit based on the property information entered by the user, and more specifically to determine a list of available properties in the specified area and/or their accompanying attributes. (Block 230). In a fourth step, the processor associates the information obtained from the third step with the digital map generated in the second step to form an integrated output on the display of the user's terminal. (Block 240). This results in the display of selectable icons on the digital map and/or textual information in window 170. The first through fourth steps may be performed in a manner analogous to those discussed with respect to the first embodiment. In a fifth step, the GPS receiver in the terminal receives location data from the GPS system. As shown in FIG. 6, receipt of this data may be initiated by the "Turn GPS On" selection window 177 in FIG. 3. This location data specifies a current position of the terminal, to within a small error. The GPS receiver inputs the location data into the processor, which then generates an icon 280 on the digital map indicating the current position of the terminal. (Block 250). …").	

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		'803 Patent, 9:52–62 ("As an alternative to the first and second steps, the second embodiment of the method of the present invention may begin with activation of the GPS receiver via selection area 208. (Block 260). This will cause the GPS receiver of the terminal to receive GPS data indicative of a current location of the terminal. This data is then forwarded to the processor, which then automatically activates the map generation unit to generate a map of an area surrounding the current location of the terminal, as determined by the received GPS data. (Block 270). Subsequent steps of the method may then proceed as described above."). '803 Patent, 3:8–17 ("In accordance with another embodiment of the invention, the data terminal communicates with one or more external sources of information. This embodiment is similar to the previous embodiment in that it includes a map generation unit, storage unit, processor, and display. In addition to these features, the terminal is equipped with a receiver for acquiring location data from an external positioning system, which may be satellite-based, cellular-based, or any other type capable of tracking the position of an object in an area of interest. Preferably, the receiver is a GPS receiver linked to the data terminal processor.").	

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		'803 Patent, 10:14–26 ("If the remote device is a database in the agent's home office, the database may be loaded with MLS data on a periodic basis so that it is kept up to date. The database may also be furnished with media information and other types of non-MLS data as previously mentioned. When a search is initiated on the terminal, the processor may then acquire information from the database for display on the terminal. The connection between the mobile terminal and remote device may be any type of communications link known. Preferably, the connection is a wireless communications link which is operatively connected to a data modem installed in the mobile terminal. If desired, however, hard-wired connections may be used."). '803 Patent, Figs. 1, 2, 4, 5. *See also* '803 Patent, 2:26–52, 3:18–36, 5:44–60, 7:46–60, 8:14–29. Dictionary/Treatise Definitions: The American Heritage Dictionary (3rd ed. 1994) (processor: "One that processes, esp. an apparatus for preparing, treating, or converting material. 2. *Comp. Sci.* a. A computer, b. A central processing unit.").	

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No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		The American Heritage College Dictionary (4th ed. 2004) (processor: "One that processes, esp. an apparatus for preparing, treating, or converting material. 2. *Computer Science*. a. A computer. b. A central processing unit. c. A program that translates another program into a form acceptable by the computer being used."). Microsoft Computer Dictionary (4th ed. 1999) (**processor** *n. See* central processing unit, microprocessor). Microsoft Computer Dictionary (4th ed. 1999) (**microprocessor** *n.* A central processing unit (CPU) on a single chip. A modern microprocessor can have several million transistors in an integrated-circuit package that can easily fit into the palm of one's hand. Microprocessors are at the heart of all personal computers. When memory and power are added to a microprocessor, all the pieces, excluding peripherals, required for a computer are present. The most popular lines of microprocessors today are the 680x0 family from Motorola, which powers the Apple Macintosh line, and the 80x86 family from Intel, which is at the core of all IBM PC-compatible computers. …).	

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		Extrinsic Evidence: Rebuttal Declaration of Mark A. Sturza, ¶¶ 58–66 *To the extent the Court determines this claim term is a means-plus-function term, Plaintiff contends that corresponding structure for the recited function is described in the specification, as cited above.	

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
5	"wherein said property information is obtained from a remote data source and a database stored on said data-enabled mobile phone" Found in claim numbers: '803 Patent: 1	Proposed Construction: (No construction needed) Intrinsic Evidence: '803 Patent, claim 1. '803 Patent, 3:32–44 ("According to another aspect of the invention, the storage unit and/or processor may be connected to a remote data source through a communications link. The communication link may be established by a data-enabled mobile phone in the terminal or by another wireless communications device. The link may also be formed by a hard-wired connection, if desired. The remote data source may be a remote server connected to a website which contains MLS and/or other information. The server may also be a database in the real-estate agent's office which has been filled with MLS and non-MLS information customized to meet the agent's perceived needs of his buyers. The non-MLS information may include the media information (e.g., a digital image or movie clip) previously mentioned."). '803 Patent, 8:45–51 ("Referring to FIG. 4, a second embodiment of the system of the present invention includes a terminal having a map generation unit 201, a storage unit 202, a processor 203, and a display 204. Unlike the first	Proposed Construction: Indefinite Intrinsic Evidence: '803 Patent at 2:40–52 ("In accordance with one embodiment of the invention, the data terminal is a stand-alone system which includes a map generation unit, a storage unit, a processor, and a display. The map generation unit generates a digital map of an area of interest designated by a user. Preferably, the map includes street address labels and/or other symbols of topological and man-made features in the coverage area. The storage unit stores property information derived from an MLS database, media information, and/or other customized information which may be considered important to a customer in purchasing, leasing, or renting property. The processor implements management software which integrates the property information with the digital map."). *Id.* at 3:32–45 ("According to another aspect of the invention, the storage unit and/or processor may be connected to a remote data source through a communications link. The communication link may be established by a data-enabled mobile phone in the terminal or by

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		embodiment, this terminal is not a stand-alone system but rather is a mobile terminal connected to a location-positioning system via a communications link."). '803 Patent, 9:13–17 ("In a third step, the processor searches the storage unit based on the property information entered by the user, and more specifically to determine a list of available properties in the specified area and/or their accompanying attributes. (Block 230)."). '803 Patent, 10:1–13 ("In another variation of the second embodiment, the terminal of the present invention is connected to a remote storage device. As shown in FIG. 4, this device 300 may be a remote server connected to a network such as the Internet, or a database located, for example, in a real-estate agent's office. In the former case, the remote server may be connected to an MLS website. In operation, when property information is input into the mobile terminal by a user the processor will automatically connect to the remote server. A search will then be performed of the MLS data at this website to obtain the information corresponding to a selected property icon. This data is then returned to the terminal for display.").	another wireless communications device. The link may also be formed by a hard-wired connection, if desired. The remote data source may be a remote server connected to a website which contains MLS and/or other information. The server may also be a database in the real-estate agent's office which has been filled with MLS and non-MLS information customized to meet the agent's perceived needs of his buyers. The non-MLS information may include the media information (e.g., a digital image or movie clip) previously mentioned."). Original Prosecution File History, 2/19/03 Amendment at 2 (*see* amendments to claim 1). *Id.* at 13 ("The claims, as amended, require generating and displaying information about a real-estate market for a geographical area of interest on a mobile computing device. A digital map is generated and displayed on the mobile computing device for an area of interest. Property information for an item of property in the area of interest is obtained from a database stored on the mobile device. This property information includes at least a location, a market price and a market status of the item of property. A property icon associated with the item of property is displayed on the digital map at the location of the item of property. In response to

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		'803 Patent, 10:14–26 ("If the remote device is a database in the agent's home office, the database may be loaded with MLS data on a periodic basis so that it is kept up to date. The database may also be furnished with media information and other types of non-MLS data as previously mentioned. When a search is initiated on the terminal, the processor may then acquire information from the database for display on the terminal. The connection between the mobile terminal and remote device may be any type of communications link known. Preferably, the connection is a wireless communications link which is operatively connected to a data modem installed in the mobile terminal. If desired, however, hard-wired connections may be used."). '803 Patent, Figs. 1, 4. *See also* '803 Patent, 2:27–52, 3:8–12, 4:19–30, 4:57–5:32, 5:54–6:2, 6:33–41, 7:1–14, 7:30–40, 7:46–55, 8:14–21, 9:18–25. '803 Patent File Wrapper, February 19, 2003 Amendment, p. 14 ("In addition, Wiese teaches accessing a remote system to gather the sales information needed to display symbols at the property locations on the map. (Col. 2, lines 62-67). As shown in Fig. 1, a remote user using CPU 72 would have to go through ISP 44, Internet 32	the property icon being selected, property information about the item of property associated with the selected property icon is also displayed."). *Id.* at 13-14 ("In addition, Wiese teaches accessing a remote system to gather the sales information needed to display symbols at the property locations on the map. (Col. 2, lines 62-67). A shown in Fig. 1, a remote user using CPU 72 would have to go through ISP 44, Internet 32 and Server 30 to access value database 54. In the present invention, the property information is obtained from a data base stored on the mobile computing device."). *See also* Original Prosecution File History, at 5/21/03 Notice of Allowability Originally issued claim 1. Extrinsic Evidence: Expert Declaration of B. Bederson, ¶¶ 73-77. Dictionary/Treatise Definitions: (none)

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		and Server 30 to access value database 54. In the present invention, the property information is obtained from a data base stored on the mobile computing device."). U.S. Patent No. 6,323,88 (Wiese) *See also* '803 Patent File Wrapper, November 30, 2001, Utility Patent Application Transmittal. *See also* '803 Patent Reexamination Wrapper, *Ex Parte Reexamination* Interview Summary, dated December 13, 2013; Statement by Patent Owner Under 37 C.F.R. § 1.30, dated December 18, 2013; Office Action in *Ex Parte Reexamination*, dated April 24, 2014; Response to Non-Final Office Action, dated July 24, 2014; Office Action in *Ex Parte Reexamination*, dated August 8, 2014; Examiner Interview Summary Record, dated October 1, 2014; Response to Final Office Action, dated October 13, 2014; *Ex Parte Reexamination* Advisory Action, dated October 24, 2014. Dictionary/Treatise Definitions: (none) Extrinsic Evidence: Rebuttal Declaration of Mark A. Sturza, ¶¶ 67–86	

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No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
6	"wherein said property information is obtained from a remote data source and stored in a database on the mobile computing device" Found in claim numbers: '803 Patent: 30	Proposed Construction: (No construction needed) Intrinsic Evidence: '803 Patent, claim 30. '803 Patent, 3:32–44 ("According to another aspect of the invention, the storage unit and/or processor may be connected to a remote data source through a communications link. The communication link may be established by a data-enabled mobile phone in the terminal or by another wireless communications device. The link may also be formed by a hard-wired connection, if desired. The remote data source may be a remote server connected to a website which contains MLS and/or other information. The server may also be a database in the real-estate agent's office which has been filled with MLS and non-MLS information customized to meet the agent's perceived needs of his buyers. The non-MLS information may include the media information (e.g., a digital image or movie clip) previously mentioned."). '803 Patent, 8:45–51 ("Referring to FIG. 4, a second embodiment of the system of the present invention includes a terminal having a map generation unit 201, a storage unit 202, a processor 203, and a display 204. Unlike the first	Proposed Construction: Indefinite Intrinsic Evidence: '803 Patent at 2:40–52 ("In accordance with one embodiment of the invention, the data terminal is a stand-alone system which includes a map generation unit, a storage unit, a processor, and a display. The map generation unit generates a digital map of an area of interest designated by a user. Preferably, the map includes street address labels and/or other symbols of topological and man-made features in the coverage area. The storage unit stores property information derived from an MLS database, media information, and/or other customized information which may be considered important to a customer in purchasing, leasing, or renting property. The processor implements management software which integrates the property information with the digital map."). *Id.* at 3:32–45 ("According to another aspect of the invention, the storage unit and/or processor may be connected to a remote data source through a communications link. The communication link may be established by a data-enabled mobile phone in the terminal or by

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		embodiment, this terminal is not a stand-alone system but rather is a mobile terminal connected to a location-positioning system via a communications link."). '803 Patent, 9:13–17 ("In a third step, the processor searches the storage unit based on the property information entered by the user, and more specifically to determine a list of available properties in the specified area and/or their accompanying attributes. (Block 230)."). '803 Patent, 10:1–13 ("In another variation of the second embodiment, the terminal of the present invention is connected to a remote storage device. As shown in FIG. 4, this device 300 may be a remote server connected to a network such as the Internet, or a database located, for example, in a real-estate agent's office. In the former case, the remote server may be connected to an MLS website. In operation, when property information is input into the mobile terminal by a user the processor will automatically connect to the remote server. A search will then be performed of the MLS data at this website to obtain the information corresponding to a selected property icon. This data is then returned to the terminal for display.").	another wireless communications device. The link may also be formed by a hard-wired connection, if desired. The remote data source may be a remote server connected to a website which contains MLS and/or other information. The server may also be a database in the real-estate agent's office which has been filled with MLS and non-MLS information customized to meet the agent's perceived needs of his buyers. The non-MLS information may include the media information (e.g., a digital image or movie clip) previously mentioned."). *Id.* at 10:1–13 ("In another variation of the second embodiment, the terminal of the present invention is connected to a remote storage device. As shown in FIG. 4, this device 300 may be a remote server connected to a network such as the Internet, or a database located, for example, in a real-estate agent's office. In the former case, the remote server may be connected to an MLS website. In operation, when property information is input into the mobile terminal by a user the processor will automatically connect to the remote server. A search will then be performed of the MLS data at this website to obtain the information corresponding to a selected property icon. This data is then returned to the terminal for display.").

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No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		'803 Patent, 10:14–26 ("If the remote device is a database in the agent's home office, the database may be loaded with MLS data on a periodic basis so that it is kept up to date. The database may also be furnished with media information and other types of non-MLS data as previously mentioned. When a search is initiated on the terminal, the processor may then acquire information from the database for display on the terminal. The connection between the mobile terminal and remote device may be any type of communications link known. Preferably, the connection is a wireless communications link which is operatively connected to a data modem installed in the mobile terminal. If desired, however, hard-wired connections may be used."). '803 Patent, Figs. 1, 4. *See also* '803 Patent, 2:27–52, 3:8–12, 4:19–30, 4:57–5:32, 5:54–6:2, 6:33–41, 7:1–14, 7:30–40, 7:46–55, 8:14–21, 9:18–25. '803 Patent File Wrapper, February 19, 2003 Amendment, p. 14 ("In addition, Wiese teaches accessing a remote system to gather the sales information needed to display symbols at the property locations on the map. (Col. 2, lines 62-67). As shown in Fig. 1, a remote user using CPU 72 would have to go through ISP 44, Internet 32	*Id.* at 10:14-26 ("If the remote device is a database in the agent's home office, the database may be loaded with MLS data on a periodic basis so that it is kept up to date. The database may also be furnished with media information and other types of non-MLS data as previously mentioned. When a search is initiated on the terminal, the processor may then acquire information from the database for display on the terminal. The connection between the mobile terminal and remote device may be any type of communications link known. Preferably, the connection is a wireless communications link which is operatively connected to a data modem installed in the mobile terminal. If desired, however, hard-wired connections may be used."). Original Prosecution File History, 2/19/03 Amendment at 2 (*see* amendments to claim 1). *Id.* at 8-9 (amending claim 30). *Id.* at 13 ("The claims, as amended, require generating and displaying information about a real-estate market for a geographical area of interest on a mobile computing device. A digital map is generated and displayed on the mobile computing device for an area of interest. Property information for an item of property in

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
		and Server 30 to access value database 54. In the present invention, the property information is obtained from a data base stored on the mobile computing device."). U.S. Patent No. 6,323,88 (Wiese) *See also* '803 Patent File Wrapper, November 30, 2001, Utility Patent Application Transmittal. *See also* '803 Patent Reexamination Wrapper, *Ex Parte Reexamination* Interview Summary, dated December 13, 2013; Statement by Patent Owner Under 37 C.F.R. § 1.30, dated December 18, 2013; Office Action in *Ex Parte Reexamination*, dated April 24, 2014; Response to Non-Final Office Action, dated July 24, 2014; Office Action in *Ex Parte Reexamination*, dated August 8, 2014; Examiner Interview Summary Record, dated October 1, 2014; Response to Final Office Action, dated October 13, 2014; *Ex Parte Reexamination* Advisory Action, dated October 24, 2014. Dictionary/Treatise Definitions: (none) Extrinsic Evidence: Rebuttal Declaration of Mark A. Sturza, ¶¶ 67–86	the area of interest is obtained from a database stored on the mobile device. This property information includes at least a location, a market price and a market status of the item of property. A property icon associated with the item of property is displayed on the digital map at the location of the item of property. In response to the property icon being selected, property information about the item of property associated with the selected property icon is also displayed."). *Id.* at 13-14 ("In addition, Wiese teaches accessing a remote system to gather the sales information needed to display symbols at the property locations on the map. (Col. 2, lines 62-67). A shown in Fig. 1, a remote user using CPU 72 would have to go through ISP 44, Internet 32 and Server 30 to access value database 54. In the present invention, the property information is obtained from a data base stored on the mobile computing device."). *See also* Original Prosecution File History, at 5/21/03 Notice of Allowability Originally issued claim 30. Extrinsic Evidence: Expert Declaration of B. Bederson, ¶¶ 78-82.

JOIN CLAIM CHART AND PREHEARING STATEMENT
Exhibit A
Case No. 2:18-cv-00847-JLR

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Joint Claim Chart

No.	Claim Term, Phrase, Element	Plaintiff's Proposed Construction and Evidence in Support	Defendants' Proposed Construction and Evidence in Support
			Dictionary/Treatise Definitions: (none)

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